

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JULIO ROCHA,

Plaintiff,

16 CV 02327 (RJD) (RML)

- against -

CERTAIN UNDERWRITERS AT LLOYD'S,  
LONDON, and AXIS SPECIALTY EUROPE  
SE,

**DECLARATION OF MICHAEL A.  
KNOERZER IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS**

Defendants.

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I, MICHAEL A. KNOERZER, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner in the law firm of Clyde & Co US LLP, counsel for Defendants Certain Underwriters at Lloyd's, London and AXIS Specialty Europe SE. I submit this Declaration in Support of Defendants' Motion to Dismiss.
2. Attached hereto as **Exhibit A** is a true and correct copy of Primary Directors and Officers Legal Liability Insurance Policy No. B0901LI1413318000, for the policy period December 30, 2014 through December 30, 2015 (the "Policy").
3. Attached hereto as **Exhibit B** is a true and correct copy of a letter dated December 22, 2015, sent by Swiss counsel for Plaintiff to Erik Stenberg.
4. Attached hereto as **Exhibit C** is a true and correct copy of the document titled "Agreement" between Julio Rocha and the Federation Internationale de Football Association ("FIFA") dated December 27, 2012, which was provided to Defendants' counsel by Plaintiff's counsel.
5. Attached hereto as **Exhibit D** is a copy of the August 2011 edition of the FIFA Statutes, which are publicly accessible at:

[http://www.fifa.com/mm/document/affederation/generic/01/48/60/05/fifastatuten2011\\_e.pdf](http://www.fifa.com/mm/document/affederation/generic/01/48/60/05/fifastatuten2011_e.pdf).

6. Attached hereto as **Exhibit E** is a true and correct copy of the Federation Internationale de Football Association's Victim Statement and Request for Restitution, dated March 15, 2016 and filed in Case No. 15-cr-252 (RJD) (RML).

7. Attached hereto as **Exhibit F** are true and correct excerpts from the Transcript of Civil Cause for Order to Show Cause, dated Tuesday June 21, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
July 15, 2016

/s/ Michael A. Knoerzer  
Michael A. Knoerzer